

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CRIMINAL NO: 16-00106-RLW-1
	)	
JAMES BOWEN,	)	
	)	
Defendant.	)	

**MOTION FOR EXTENSION**

COMES NOW the Defendant, by and through his attorney, Ethan Skaggs, Assistant Federal Public Defender for the Southern District of Illinois, and for his Motion for Extension states as follows:

1. The Officer of the Federal Public Defender for the Southern District of Illinois was appointed to assist the Defendant with a possible motion for Compassionate Release.
2. Counsel intends to file a supplemental motion for compassionate release on behalf of the Defendant. Counsel is in the process of drafting the supplemental motion. Counsel has had continuing and recent contact with Mr. Bowen. Counsel has also recently received what appears to be the most updated BOP medical records for Mr. Bowen. There are questions raised in same that Counsel has identified. Consequently Counsel is attempting to obtain records directly from the outside medical facility that Mr. Bowen was taken for treatment.
3. Counsel needs an extension of time to complete a supplemental motion for compassionate release to file on the Defendant's behalf.
4. No party will be prejudiced if the period of time to file supplemental pleadings is extended to February 21, 2021.
5. Counsel has informed the Government this motion is being filed.

WHEREFORE, Defendant prays that this Honorable Court grant his Motion for Extension and allow the Defendant until February 21, 2021 to file a supplemental pleadings in this matter.

Respectfully submitted,

/s/ Ethan Skaggs

ETHAN SKAGGS

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ATTORNEY FOR DEFENDANT

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that he has caused a true and correct copy of the foregoing to be served upon the assigned Assistant United States Attorney, Southern District of Illinois, via electronic filing with the Clerk of the Court using the CM/ECF system on February 4, 2021.

/s/ Ethan Skaggs